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**UNITED STATES DISTRICT COURT**  
**FOR THE NORTHERN DISTRICT OF CALIFORNIA, SAN JOSE DIVISION**

JINJU ZHANG, an individual;

Plaintiff,

vs.

BELIN YUAN, an individual; HONG LIN, an individual; CAMIWELL, INC., a California corporation; CAMIWELL, INC. (CANADA), a Canadian corporation; BEJING ASIACOM TECHNOLOGY CO., LTD., a Chinese corporation; ASIACOM AMERICAS, INC., a Virginia corporation; BANK OF AMERICA CORPORATION, a National Association; and DOES 1 to 20, inclusive,

Defendants.

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BANK OF AMERICA, N.A.,

Counter-Claimant,

vs.

JINJU ZHANG, an individual; CAMIWELL, INC., a California corporation; and ROES 1 TO 20, inclusive,

Counter-Defendants.

Case No.: 3:23-cv-05818-CRB

**PLAINTIFF AND COUNTER-DEFENDANT  
JINJU ZHANG’S ANSWER TO BANK OF  
AMERICA, N.A.’S COUNTERCLAIM FOR  
INTERPLEADER**

1 Comes now the Plaintiff and Counter-Defendant, JINJU ZHANG (“ZHANG”) and, for his  
2 Answer to Counter-Claimant BANK OF AMERICA, N.A.’s (hereinafter “BANA”) Counterclaim for  
3 Interpleader, as follows:

4 1. In response to Paragraph 1, Zhang lacks information or belief sufficient to answer the  
5 allegations contained therein; and accordingly denies them.

6 2. In response to Paragraph 2, Zhang admits that BANA has no interest in the bank accounts  
7 ending in x0628 and x4390 (the “Accounts”) in connection with this action. To the extent allegations  
8 remain unanswered, Zhang lacks information or belief sufficient to answer the allegations contained  
9 therein; and accordingly denies the same.

10 3. In response to Paragraph 3, Plaintiff admits.

11 4. In response to Paragraph 4, Zhang lacks information or belief sufficient to answer the  
12 allegations contained therein; and accordingly denies them.

13 5. In response to Paragraph 5, Zhang lacks information or belief sufficient to answer the  
14 allegations contained therein; and accordingly denies them.

15 6. In response to Paragraph 6, Zhang lacks information or belief sufficient to answer the  
16 allegations contained therein; and accordingly denies them.

17 7. In response to Paragraph 7, Zhang states that this paragraph contains legal conclusions  
18 that do not require denial or admission. To the extent that a response is required, Zhang lacks information  
19 or belief sufficient to answer the allegations contained therein; and accordingly denies them.

20 8. In response to Paragraph 8, Zhang lacks information or belief sufficient to answer the  
21 allegations contained therein; and accordingly denies them.

22 WHEREFORE, Zhang prays that the Court issue an order: (i) resolving the competing rights  
23 and claims of Zhang and Camiwell to the Accounts and funds on deposit therein; (ii) denying BANA’s  
24 request to dismiss the action as to BANA and restraining Plaintiff, Camiwell or any other party from  
25 instituting or pursuing any action against BANA with regard to the Accounts or funds on deposit therein;  
26 (iii) denying BANA’s request that the Court award BANA recovery of its costs associated with this  
27 action, including, but not limited to, reasonable attorneys fees; and (iv) denying BANA’s request that  
28 the Court award BANA any such further relief.

1 Dated: January 26, 2024

SAC Attorneys LLP

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3 By: *Dennis Chin*  
4 James Cai, Esq.  
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6 Dennis Chin, Esq.  
7 Attorneys for Plaintiff and Counter-Defendant,  
8 Jinju Zhang  
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